

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MARK OWEN, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

ELASTOS FOUNDATION, FENG HAN, and  
RONG CHEN,

Defendants.

Hon. Gregory H. Woods

Civil Action No. 1:19-cv-5462-GHW

CLASS ACTION

**LEAD PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF PROPOSED  
CLASS ACTION SETTLEMENT**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Lead Plaintiffs James Wandling and Mark Owen (“Lead Plaintiffs”), on behalf of themselves and each member of the proposed Settlement Class, move for entry of the Parties’ agreed-upon [Proposed] Order Preliminary Approving Settlement and Providing for Class Notice, submitted herewith, which will provide for: (i) preliminary approval of the settlement; (ii) approval of the form and manner of giving notice of the settlement to the proposed Settlement Class; and (iii) a hearing date and time to consider final approval of the settlement and related matters. This motion is based on the accompanying memorandum of law, the attached Stipulation of Settlement and its exhibits, the Declaration of Javier Bleichmar and its exhibits, and all prior pleadings and proceedings herein.

Dated: July 27, 2023

Respectfully Submitted,

**BLEICHMAR FONTI & AULD LLP**

*/s/ Javier Bleichmar*

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